

# **EXHIBIT 1**

**From:** [Shane Bradwell](#)  
**To:** [Moradi, Maseeh](#)  
**Cc:** [Clarissa Pintado](#); [Gorsche, Sam](#)  
**Subject:** RE: WHS Litigation - meet and confer re additional 30(b)(6) time  
**Date:** Tuesday, October 22, 2024 4:26:30 PM

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**EXTERNAL EMAIL - Use caution with links and attachments.**

Hi Maseeh,

I have no objection to the filing of the amended complaint. Please note for the record, we continue to believe that Count VII fails to assert a viable cause of action, and will be moving to dismiss that claim again.

Thanks,

Shane

SHANE BRADWELL  
[PARTNER](#)

One East Wacker Drive | Suite 3400 | Chicago | IL | 60601  
PH 312.422.6100 | DIR 312.422.6125 | FX 312.422.6110



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**From:** Moradi, Maseeh <[mmoradi@sidley.com](mailto:mmoradi@sidley.com)>  
**Sent:** Tuesday, October 22, 2024 3:00 PM  
**To:** Shane Bradwell <[sbradwell@ohaganmeyer.com](mailto:sbradwell@ohaganmeyer.com)>  
**Cc:** Clarissa Pintado <[cpintado@ohaganmeyer.com](mailto:cpintado@ohaganmeyer.com)>; Gorsche, Sam <[sgorsche@sidley.com](mailto:sgorsche@sidley.com)>  
**Subject:** [EXTERNAL] RE: WHS Litigation - meet and confer re additional 30(b)(6) time

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Thanks, Shane. The amendment, attached here, simply repleads Count VII, which Judge Kendall dismissed without prejudice.

Best,  
Maseeh

**MASEEH MORADI**  
Managing Associate

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immediately.  
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**From:** Shane Bradwell <[sbradwell@ohaganmeyer.com](mailto:sbradwell@ohaganmeyer.com)>  
**Sent:** Tuesday, October 22, 2024 2:47 PM  
**To:** Moradi, Maseeh <[mmoradi@sidley.com](mailto:mmoradi@sidley.com)>

**Cc:** Clarissa Pintado <cpintado@ohaganmeyer.com>

**Subject:** RE: WHS Litigation - meet and confer re additional 30(b)(6) time

Hi Maseeh –

I would need to see the amendment to determine if we are going to oppose it..

SHANE BRADWELL

**PARTNER**

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**From:** Moradi, Maseeh <[mmoradi@sidley.com](mailto:mmoradi@sidley.com)>

**Sent:** Tuesday, October 22, 2024 2:40 PM

**To:** Shane Bradwell <[sbradwell@ohaganmeyer.com](mailto:sbradwell@ohaganmeyer.com)>

**Subject:** [EXTERNAL] RE: WHS Litigation - meet and confer re additional 30(b)(6) time

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Shane,

Hope you're doing well — I just called but couldn't reach you. We are planning to replead Count VII and to file that amendment later today. Rule 15 requires us to either seek Defendants' written consent or else seek leave from the Court to amend. Can you let me know if Defendants consent to us filing our amended complaint?

Thanks,  
Maseeh

**MASEEH MORADI**  
Managing Associate

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